



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
Washington, D.C. 20224

MAR 02 2004

COMMISSIONER
SMALL BUSINESS/SELF-EMPLOYED DIVISION

Frederick Nerlinger
Delores Nerlinger
5250 Roosevelt Boulevard, Number 5b
Clearwater, Florida 33760-3451

Person to Contact:

Andrew M. Daxon ID #59-01049

Address:

3848 West Columbus Drive, Ste. A
Tampa, Florida 33607-5768

Telephone Number:

(813) 315-2304

Refer Reply To:

RA:1302:AMD

Date:

February 18, 2004

Dear Mr. and Mrs. Frederick Nerlinger:

In your letter dated January 14, 2004 regarding my correspondence and personal visit, you wrote that "it was your understanding that I did not need to respond if I did not wish to accept your offer". You are correct. You do not need to respond if you did not wish to accept the offer. However, as provided in the last paragraph of the Letter 3649 dated November 24, 2003, see attached copy, "In the event you choose not to respond, you will be examined...". This letter and the enclosed Letter 2205 are informing you that your years ending December 31, 2000 and December 31, 2001 are being placed under examination and an appointment has been scheduled for March 4, 2004.

Please find enclosed Form 4564, Information Document Request, which identifies the needed items to commence the examination. Please have the items available for the initial meeting.

Please contact me at the telephone number provided above so we may discuss the examination and requested items.

Thank you for your cooperation and assistance.

Sincerely yours,

A handwritten signature in cursive script that reads "Andrew M. Daxon".

Andrew M. Daxon
Internal Revenue Agent

Enclosure(s):

Letter 3649 dated November 24, 2003
Letter 2205
Form 4564
Publication 1
Notice 609

Internal Revenue Service

Department of the Treasury

Date: February 18, 2004

MAR 02 2004

Mr. Frederick M. Nerlinger
Mrs. Delores R. Nerlinger
5250 Roosevelt Blvd., #5b
Clearwater, Florida 33760

Taxpayer Name:
Frederick and Delores Nerlinger
Taxpayer Identification Number:
391-52-9500
Tax Form:
1040
Tax Period(s):
December 31, 2000 & 2001
Person to Contact:
Andrew M. Daxon
Employee Identification Number:
59-01049
Telephone Number:
(813) 315-2304
FAX Number:
(813) 315-2492

Dear Taxpayer:

The purpose of this letter is to let you know that I have scheduled the following appointment to meet with you and examine the above referenced tax return:

Place: 3848 West Columbus Drive, Ste. A
Tampa, Florida 33607

Date: March 4, 2004

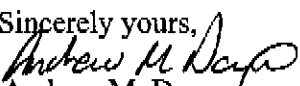
Time: 9:00 a.m.

Should you need to change this date, please contact me to arrange a more convenient meeting. I will consider the above appointment confirmed if I don't hear from you by February 25, 2004.

In order to minimize the time we need to complete the examination, please have available the items listed on the attached Form 4564, *Information Document Request*, at our first appointment.

You may have someone represent you during any part of this examination. Should you want someone to represent you, please give us a completed Form 2848, *Power of Attorney and Declaration of Representative*, at our first meeting. We will delay examination activity to allow you time later to secure a representative if you choose.

We encourage you to read the enclosed Publication 1, *Your Rights as a Taxpayer*, and Notice 609, *Privacy Act and Paperwork Reduction Act*. Thank you for your cooperation.

Sincerely yours,

Andrew M. Daxon
Internal Revenue Agent

Enclosures:
Publication 1
Notice 609
Form 4564

Letter 2205 (DO) (Rev. 10-1999)
Catalog Number 63744P

Form 4564

**Department of the Treasury
Internal Revenue Service
Information Document Request**

Request Number

1

MAR 02 2004

To: Frederick M. and Delores R. Nerlinger

5250 Roosevelt Blvd., # 5b
Clearwater, Florida 33760

Subject:

Examination of 2000 & 2001 Form 1040

Submitted to: Frederick & Delores Nerlinger**Dates of Previous Requests:****Description of Documents Requested for the examination of the 2000 and 2001 years:**

IT IS IMPORTANT THAT YOU HAVE THE FOLLOWING INFORMATION AVAILABLE FOR OUR APPOINTMENT. PRESENTING ALL THE INFORMATION REQUESTED WILL EXPEDITE THE EXAMINATION PROCESS. THANK YOU FOR YOUR COOPERATION.

1. COPY OF THE FOLLOWING TAX RETURNS AND INFORMATION RETURN FORMS FILED, if applicable:
 - A. Complete copy of your U.S. Individual Income Tax Returns Forms 1040, including all schedules and attached information returns (i.e., Form 5471, Form 8865, Form 3520, Form 926, etc.) for the year(s) 2000, 2001 and 2002.
 - B. Any Form 1099 information returns received for the year(s) 2000 and 2001.
 - C. Any Form 1099 information returns issued by you for the year(s) 2000 and 2001.
 - D. Complete copy of any U.S. Partnership Return of Income Form 1065 including all schedules and attached information returns for the 2000 and 2001 year(s) for which you were either a General Partner, managing member or named as the Tax Matters Partner.
 - E. Complete copy of any U.S. Corporation Income Tax Return Form 1120 or 1120S, including all schedules and attached information returns for the year(s) 2000 and 2001 for each corporation of which you owned more than 50 percent of the total combined voting power of all classes of stock or more than 50 percent of the total value of the stock of the corporation.
 - F. Complete copy of any U.S. Income Tax Return of a Foreign Corporation Form 1120F, including all schedules and attached information returns for the year(s) 2000 and 2001 for which you owned more than 50 percent of the total combined voting power of all classes of stock or more than 50 percent of the total value of the stock of the corporation.
 - G. Complete copy of any U.S. Income Tax Return for Estates and Trusts Form 1041, including all schedules and attached information returns for which you were the fiduciary or a beneficiary of the Estate or Trust for the year(s) 2000 and 2001.
 - H. Copy of any Annual Information Return of Foreign Trust With a U.S. Owner Form 3520-A for the year(s) 2000 and 2001 for which you are treated as the beneficial owner.
 - I. Copy of any Report Of Foreign Bank And Financial Accounts TD F90-22.1 filed for the year(s) 2000 and 2001.
 - J. Complete copy of Form 1042, Annual Withholding Tax Return for U.S. Source Income of Foreign Persons including Form(s) 1042S, Foreign Person's U.S. Source Income Subject to Withholding, for the year(s) 2000 and 2001.
2. Copy of any financial statements prepared by or for you for any purpose during or for the year(s) 2000 and 2001.

Information Due By 3/4/2004 At Next Appointment☒

Mail In

☐**Name and Title of Requestor**

Andrew M. Daxon, Internal Revenue Agent Badge # 59-01049

Date:

February 18, 2004

FROM**Office Location:**

3848 West Columbus Drive, Ste. A
Tampa, Florida 33607-5768

Phone: Voice (813) 315-2304
FAX (813) 315-2492

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Form 4564

EXHIBIT A. 3

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number 1
To: Frederick M. and Delores R. Nerlinger 5250 Roosevelt Blvd., # 5b Clearwater, Florida 33760		Subject: Examination of 2000 & 2001 Form 1040 Submitted to: Frederick & Delores Nerlinger Dates of Previous Requests:

Description of Documents Requested for the examination of the 2000 and 2001 years:

3. All monthly statements for bank or financial accounts at domestic or foreign banks, savings and loans, credit unions, or other financial institution, under any name, over which you beneficial ownership, had signature or other authority¹ or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever, for the period from January 1, 2000 through December 31, 2001. In addition, provide duplicate deposit slips and/or verification of the origin of all deposited items for all deposits; copies of all debit and credit memos; copies of all wire transfer authorizations; all cancelled checks and check registers for these accounts.
4. All Statements of Certificate of Deposit for all Certificates of Deposit, Time Deposit, or equivalent accounts at domestic or foreign financial institutions over which you had beneficial ownership, signature authority or other authority, or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever, and which was in existence at any time during the year(s) 2000 and 2001. In addition, provide verification of the origin of all funds used to open these accounts or deposited to these accounts at any time.
5. For any transfers of funds during the year(s) 2000 and 2001 between all bank or financial accounts domestic or foreign over which you have beneficial ownership, signature or other authority, or over which you exercised control, either directly or through nominees, agents, powers of attorney, letters of direction, or any device whatsoever, please provide the following:
 - a) A list of such transfers.
 - b) If you wrote a check from one account that was then deposited into another account provide a copy (front & back) of the cancelled check.
 - c) If you wired the money from one account on which you had authority to another account for which you had authority, provide the wire transfer authorization including a copy of the bank statement of the account from which the money was transferred and the statement of the account to which the money was deposited showing this transaction.
 - d) If you deposited cash then provide a bank statement from the account that this cash was withdrawn from, and the statement of the account it was deposited to.

* * * *

¹ **Signature or Other Authority Over an Account** A person has signature authority over an account if such person can control the disposition of money or other property in it by delivery of a document containing his or her signature (or his or her signature and that of one or more other persons) to the bank or other person with whom the account is maintained. Other authority exists in a person who can exercise comparable power over an account by direct communication to the bank or other person with whom the account is maintained, either orally or by some other means.

Information Due By 3/4/2004 At Next Appointment ☒ Mail In ☐

FROM	Name and Title of Requestor	Date:
	Andrew M. Daxon, Internal Revenue Agent Badge # 59-01049	February 18, 2004
	Office Location: 3848 West Columbus Drive, Ste. A Phone: Voice (813) 315-2304 Tampa, Florida 33607-5768 FAX (813) 315-2492	

Form 4564

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Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number 1
To: Frederick M. and Delores R. Nerlinger 5250 Roosevelt Blvd., # 5b Clearwater, Florida 33760		Subject: Examination of 2000 & 2001 Form 1040 Submitted to: Frederick & Delores Nerlinger Dates of Previous Requests:

Description of Documents Requested for the examination of the 2000 and 2001 years:

- e) Copies of any advice, correspondence or other direction you may have communicated regarding the withdrawal and/or deposit
6. Documentation of all non-taxable sources of income such as the proceeds of loans, gifts, inheritances, tax refunds, or tax-exempt interest you received in calendar year(s) 2000 and 2001.
7. Copy of any loan agreements for loans either made by you or obtained by you, which were in existence during the year(s) 2000 and 2001, including a record of all payments or receipt of principal and interest. For funds loaned by you, provide documentation as to the disbursement of the loan (i.e., cancelled check, wire transfer authorization, etc.) If the funds were borrowed by you and the loan funds were deposited into a bank account, please provide a copy of the bank statement where the funds were deposited and a copy of the deposited item. If the loan funds obtained were not deposited into a bank account please provide documentation to show where the loan funds were disbursed.
8. For any loans made, obtained or existing, or other credit extended or received by you or any entity controlled by you directly, indirectly through power of attorney, letter of wishes or nominee during the 2000 and 2001 year(s), please provide a complete copy of the loan application and any related correspondence.
9. List of all credit/debit/charge cards, foreign or domestic, under any name, used by you to make purchases, cash withdrawals or advances or to pay expenses for any purpose, including personal or business use, during the year(s) 2000 and 2001. Include the name or company the card is issued to, the card account number and the name and address of the issuer of the credit/debit/charge card and a copy of the application for card. In addition, provide all charge statements and charge receipts for all cards on such accounts for the year(s) 2000 and 2001.
10. Please list all other credit/debit/charge cards, under any name, over which you held withdrawal privileges, whether or not actually used.
11. Please provide a schematic diagram of all entities, foreign and domestic, in which you held an ownership interest, legal or beneficial, at any time during the tax year(s) ending December 31, 2000 and 2001. This diagram should include partnerships, joint ventures and trusts as well as corporate entities, including their foreign branches, and any other type of entity provided for by foreign laws, in which you held a direct or indirect, legal or beneficial, ownership interest.
 - a) Indicate your percentage of ownership interest in each entity.
 - b) Indicate the country in which the entity was created or organized.
 - c) Indicate the country where the entity operates.
 - d) Indicate whether the entity was formed for a particular purpose and what assets are held by the entity.

Information Due By 3/4/2004 At Next Appointment ☒ Mail In ☐

FROM	Name and Title of Requestor	Date:
	Andrew M. Daxon, Internal Revenue Agent Badge # 59-01049	February 18, 2004
	Office Location: 3848 West Columbus Drive, Ste. A Tampa, Florida 33607-5768 Phone: Voice (813) 315-2304 FAX (813) 315-2492	Page 3

Form 4564	Department of the Treasury Internal Revenue Service Information Document Request	Request Number 1
To: Frederick M. and Delores R. Nerlinger 5250 Roosevelt Blvd., # 5b Clearwater, Florida 33760		Subject: Examination of 2000 & 2001 Form 1040 Submitted to: Frederick & Delores Nerlinger Dates of Previous Requests:

Description of Documents Requested for the examination of the 2000 and 2001 years:

- e) Indicate any changes in ownership occurring during the tax year(s) ending December 31, ____.
- 1) Provide detailed information regarding any corporation or other entities which you owned during the calendar year ending December 31, ____ but which you no longer owned for your calendar year ending December 31, _____. Include the tax treatment of each change.

11. During the tax year(s) 2000 and/or 2001, did you pay any foreign entity or individual:

- a) Management Fees
- b) Consulting Fees
- c) Research and Development Fees
- d) Insurance Premiums
- e) Legal Fees
- f) Brokerage Fees
- g) Royalties
- h) Lease or Rental Fees
- i) Loan Fees
- j) Interest
- k) Salaries or Wages,

Please list the amount of the fees, the name, address and telephone number of the person paid, and the date of each payment. In addition, provide copies of all contracts, agreements, invoices and correspondence concerning the negotiation of, the contracting of and the payment of these fees.

12. Please provide the name, address, and telephone number of each private banker, broker, investment or other financial advisor, advisor on privacy matters, lawyer, and accountant from whom you received advice or services during the year(s) 2000 and 2001.

Please be advised that we may require additional information and documentation as we determine necessary as the examination progresses.

Please Provide This Information and Documentation at Our First Appointment Scheduled for March 31, 2004.

Information Due By 3/4/2004 At Next Appointment ☒ Mail In ☐

FROM	Name and Title of Requestor	Date:
	Andrew M. Daxon, Internal Revenue Agent Badge # 59-01049	February 18, 2004
	Office Location: 3848 West Columbus Drive, Ste. A Phone: Voice (813) 315-2304 Tampa, Florida 33607-5768 FAX (813) 315-2492	